

PETER G. SIACHOS  
PSIACHOS@GRSM.COM  
DIRECT DIAL: (973) 549-2532

**GORDON & REES**  
**SCULLY MANSUKHANI**  
**YOUR 50 STATE PARTNER®**

ATTORNEYS AT LAW  
1 BATTERY PARK PLAZA, 28<sup>TH</sup> FLOOR  
NEW YORK, NEW YORK 10004  
WWW.GRSM.COM

February 23, 2021

**VIA ECF**

Honorable Gary R. Brown  
U.S. District Court  
Eastern District of New York  
100 Federal Plaza, Courtroom 840  
Central Islip, New York 11722

**Re:    *McDowall et al. v. ILKB LLC et. al.***  
Case No. 2:20-cv-06171-GRB-AKT

Dear Judge Brown:

Pursuant to Section II.e.-f. of Your Honor's Individual Rules, to the extent not already done and based on the returns of summons now on file, Defendants ILKB, LLC, ILKB Too, LLC, Dan Castellini, and Shaun York join in the prior request a pre-motion conference filed on February 1, 2021. These newly appearing Defendants join the prior letter motion in all respects.

Additionally, this letter informs the Court that the Parties have been in communication regarding early resolution and may be seeking additional time to have an opportunity to resolve. If that is the case, the Parties will promptly notify the Court by joint letter.

Best regards,

*/s/ Peter G. Siachos*

Peter G. Siachos